

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CHR. HANSEN HMO GMBH,

*Plaintiff and Counterclaim-Defendant,*

v.

GLYCOSYN LLC,

*Defendant and Counterclaim-Plaintiff,*

v.

ABBOTT LABORATORIES.

*Counterclaim-Defendant.*

C.A. No. 1:22-cv-11090-NMG

**DECLARATION OF ALLISON M. LUCIER**  
**IN SUPPORT OF PLAINTIFF’S OPENING CLAIM CONSTRUCTION BRIEF**

I, Allison M. Lucier, declare and state as follows:

1. I am an attorney licensed to practice law in the Commonwealth of Massachusetts
2. I am a partner at Holland & Knight LLP. I am counsel for Chr. Jamsen HMO GmbH (“Chr. Hansen”) in the above-captioned cases.
3. I have personal knowledge of the facts contained herein and, if called as a witness, I could and would testify competently thereto. I make this Declaration in Support of Plaintiff’s Opening Claim Construction Brief.
4. Attached hereto as Exhibit A is a true and correct copy of excerpt from the Mosby’s Medical Dictionary, 10<sup>th</sup> ed., Elsevier, Inc., 2017.
5. Attached hereto as Exhibit B is a true and correct copy of excerpt from the New Oxford American Dictionary, 3<sup>rd</sup> ed., Oxford University Press, 2010.

6. Attached hereto as Exhibit C is a true and correct copy of an excerpt from The American Heritage® Dictionary of the English Language, 5<sup>th</sup> ed., Houghton Mifflin Harcourt Publishing Company, 2011.

7. Attached hereto as Exhibit D is a true and correct copy of an excerpt from A Dictionary of Science, 7<sup>th</sup> ed., Oxford University Press 2017.

8. Attached hereto as Exhibit E is a true and correct copy of an excerpt from Biochemistry. 2<sup>nd</sup> ed., Macmillan Publishing Company, 1988.

9. Attached hereto as Exhibit F is a true and correct copy of an excerpt from the Dictionary of Microbiology and Molecular Biology, 3<sup>rd</sup> ed., John Wiley & Sons, Ltd., revised, 2006.

10. Attached hereto as Exhibit G is a true and correct copy of an excerpt from Dorland's Illustrated Medical Dictionary, 33<sup>rd</sup> ed., Elsevier, Inc., 2020.

11. Attached hereto as Exhibit H is a true and correct copy of the Declaration of Dr. Eleftherios (Terry) Papoutsakis in support of Chr. Hansen's Opening Claim Construction Brief.

12. Attached hereto as Exhibit I is a true and correct copy of the Declaration of John M. McCoy dated February 9, 2015.

I declare that the foregoing is true and correct.

Dated: August 24, 2023

/s/ Allison M. Lucier  
Allison M. Lucier